

May 16, 2024

VIA ECF

The Honorable Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers 304N, Courtroom 13C South
Brooklyn, NY 11201

Re: *CoraMed USA, LLC., d/b/a CoraMed Solutions v. Alexion Pharmaceuticals, Inc.*, No. 1:20-cv-02052 (ENV) (SJB)

Dear Judge Bulsara:

We represent Alexion Pharmaceuticals, Inc. (“Alexion”) in the above-referenced matter. We submit this joint letter motion to extend the discovery deadlines set forth in the Discovery Scheduling Order filed on October 11, 2023. *See DE 75.* The parties make this joint motion pursuant to Your Honor’s Individual Rule No. IV.B. Prior to submitting this application, counsel met and conferred pursuant to Fed. R. Civ. 37(a)(1), and determined that an extension was necessary in order to complete discovery. This is the parties’ first joint request to extend the discovery deadlines during Phase III discovery.¹

Specifically, the parties require additional time to complete discovery because, after the completion of document discovery on March 25, the parties focused their resources on the May 7, 2024 settlement conference before Magistrate Judge Joseph A. Marutollo. The parties were unable to reach a settlement, however, and now must complete discovery, including depositions (at least one of which will require international travel). In addition, within the past week, both CoraMed and a third party have made supplemental document productions, and Alexion will require some additional time to review the newly-received documents. Consequently, the parties need additional time to prepare for and complete discovery. The parties respectfully request that the Discovery Scheduling Order be amended as follows:

- Extend the fact discovery deadline from June 10, 2024 to July 31, 2024.

¹ The Court previously granted CoraMed’s request for a two week extension to the document discovery deadline. *See DE 90.*

May 16, 2024

Page 2

- Extend the expert report deadline from August 12, 2024 to September 30, 2024.
- Extend the rebuttal expert report deadline from September 10, 2024 to October 31, 2024.
- Extend the reply expert report deadline from October 10, 2024 to November 29, 2024.
- Extend the completion of expert discovery depositions from November 11, 2024 to January 24, 2025.
- Extend the deadline for dispositive motion practice from January 15, 2025 to March 14, 2025.

Respectfully submitted,



Paula Ramer

cc: Counsel of record (via ECF)